

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|---|---|-------------------------|
| Eugene Westmoreland, |) | |
| |) | |
| Plaintiff, |) | No.: 23-cv-1851 |
| |) | |
| v. |) | |
| |) | Hon. Jeffrey T. Gilbert |
| Cook County Sheriff Thomas Dart, et al. |) | |
| |) | |
| Defendants. |) | |
| |) | |

**DEFENDANTS' AGREED MOTION FOR EXTENSION
OF TIME TO FILE RESPONSE IN OPPOSITION TO
PLAINTIFF'S MOTION FOR PERMANENT INJUNCTION**

NOW COME Defendants COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, pursuant to Fed. R. Civ. P. 6(b), and for Defendants' Agreed Motion for Extension of Time to File Response in Opposition to Plaintiff's Motion for Permanent Injunction, state as follows:

1. Counsels for all parties have been in communication regarding this Motion, and all are in agreement as to the requested extension.
2. On April 6, 2024, Plaintiff filed his Motion for Permanent Injunctive Relief with the Court. ECF No. 72.
3. Thereafter, on April 9, 2024, this Court issued an order laying out a briefing schedule as follows: Defendants' Response in Opposition to Plaintiff's Motion due on or before May 6, 2024; and Plaintiff's Reply in Support due on or before May 20, 2024. ECF No. 73.
4. Defendants now request an 18 (eighteen) day extension, until May 24, 2024, to file their Response in Opposition to Plaintiff's Motion for Permanent Injunction.
5. Counsel for Defendants are currently working and developing their brief and require additional time to formulate and finalize their arguments.

6. Under Rule 6(b), this Court may, for good cause, extend the time “[w]hen an act may or must be done.” Fed. R. Civ. P. 6(b).
7. Not granting an extension of time would prejudice Defendants because the current May 6, 2023, deadline will not allow sufficient time to properly prepare and submit Defendants’ brief.
8. Granting an extension of time will not prejudice any party and this motion is not brought for undue delay or any improper purpose.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order as follows:

1. Defendants’ Motion for Extension of Time is granted;
2. Defendants’ Response in Opposition to Plaintiff’s Motion for Permanent Injunction shall be filed by May 24, 2024; and
3. Any other such relief as this court deems reasonable and just.

Respectfully Submitted,

Defendants

By: /s/ Zachary G. Stillman
Zachary G. Stillman, One of the
Attorneys for Defendants

DEVORE RADUNSKY LLC

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that Defendant’s Motion for Extension of Time to File Response in Opposition to Motion for Permanent Injunction was filed on April 22, 2024, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman

Zachary Stillman